



REEDER MCCREARY
LLP

May 3, 2023

VIA ECF

The Honorable Sarah Netburn
 United States District Court
 Southern District of New York
 Thurgood Marshall Courthouse
 New York, NY 10007

Re: Lynne Freeman v. Tracy Deebs-Elkenaney et. al., 1:22 Civ 02435 (AT)(SN)

Dear Judge Netburn:

Plaintiff Lynne Freeman and Defendants Tracy Deebs-Elkenaney p/k/a Tracy Wolff, Entangled Publishing, LLC, Holtzbrinck Publishers, LLC d/b/a Macmillan, Universal City Studios LLC, Prospect Agency, LLC, and Emily Kim Sylvan jointly write to advise the Court that the parties have stipulated to extend the deadlines for opening and rebuttal expert disclosures by an additional three business days each. As the Court is aware, the parties recently moved those same deadlines by one week. This agreement only affects these two specific deadlines and no Court deadlines. The updated stipulated schedule is as follows.

Event	Due Date
Expert disclosures and opening reports	5/10/23 (previously 5/5/23)
Expert rebuttal reports and disclosure of any rebuttal experts	5/31/23 (previously 5/26/23)
Expert depositions to be completed by	6/16/23
Pre-motion conference letters for summary judgment and/or <i>Daubert</i> motions (pursuant to Judge Stanton's Individual Rule 2.A)	6/30/23
Plaintiff's opening set of proposed findings of ultimate fact (pursuant to Judge Stanton's Individual Rule 4.A)	6/30/23
Opening summary judgment and <i>Daubert</i> motions	7/26/23
Summary judgment and <i>Daubert</i> oppositions	8/23/23
Summary judgment and <i>Daubert</i> replies	9/13/23

The parties will further update the Court if any issues requiring the Court's involvement arise. Thank you for your time and attention to this issue.

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Respectfully submitted,

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cc: All Counsel of Record (via ECF)